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9 **IN THE UNITED STATES DISTRICT COURT**
10 **WESTERN DISTRICT OF WASHINGTON**

11 **SHERRY HANSON AND STEVEN**
12 **HANSON, husband and wife,**

13 **Plaintiffs,**

14 **vs.**

15 **CITY OF SEATTLE, a governmental entity,**
16 **UNITED STATES POSTAL SERVICE, a**
17 **governmental entity , and UNITED**
18 **STATES GENERAL SERVICES**
19 **ADMINISTRATION, a governmental**
20 **agency,**

21 **Defendants.**

22 **No.**

23 **COMPLAINT FOR PERSONAL**
24 **INJURIES**

25 Come now Plaintiffs Sherry Hanson and Steven Hanson, by and through
26 their attorney of record, Paul Wallstrom of Wallstrom Law offices, and allege:

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PLAINTIFFS

1.

At all times relevant hereto, Plaintiffs Sherry Hanson and Steven Hanson were and are married persons and residents of Sarasota, Florida.

JURISDICTION AND VENUE

2.

The Court has jurisdiction over this action against the United States agencies under 28 U.S.C. §1346 (b)(1). The appropriate venue for this case for the claims against the agencies of the United States under 28 U.S.C. §1402 is the Western District of the Federal District Court of the State of Washington. The Court has supplemental jurisdiction over defendant City of Seattle pursuant to 28 U.S.C. § 1337.

DEFENDANTS

3

This action is brought against the United States of America under 28 U.S.C. §2674 and against the City of Seattle under Chapter 4.92 RCW.

COMPLAINT FOR PERSONAL INJURIES - 2

WALLSTROM LAW OFFICES
1734 NW MARKET STREET
SEATTLE, WA 98107
Phone: (206) 420-0180
Fax: (206) 407-3798
Email: info@wallstromlaw.com

NEGLIGENCE

4.

On June 19, 2009, Plaintiff Sherry Hanson was injured in a fall which occurred when she stepped in an unmarked hole in the sidewalk outside the United States Postal Service facility at 909 First Avenue, City of Seattle, County of King, State of Washington. The United States Postal Service operated the facility immediately adjacent to the sidewalk hole in which Plaintiff Sherry Hanson fell. The United States General Services Administration was the landlord of the United States Postal Service for the facility. The hole in the sidewalk was unreasonably dangerous. Each of the Defendants knew or should have known that the hole would cause injuries to those persons walking on the sidewalk for which negligence Defendants are liable to Plaintiffs for their damages. The Defendants were negligent for allowing the defective construction and/or maintenance of the sidewalk outside the United States Postal Service facility.

DAMAGES

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5.1 As a direct and proximate result of the accident described herein and as a direct and proximate result of the negligent acts and omissions of the Defendants, Plaintiff Sherry Hanson has suffered pain, mental and physical anguish, and continued physical disability since June 19, 2009.

COMPLAINT FOR PERSONAL INJURIES - 3

WALLSTROM LAW OFFICES
1734 NW MARKET STREET
SEATTLE, WA 98107
Phone: (206) 420-0180
Fax: (206) 407-3798
Fax: (206) 600-2917

1 5.2 As a further direct and proximate result of Defendants'
2 negligence, Plaintiff Sherry Hanson has suffered significant monetary losses
3 resulting from the impairment of her earning capacity and her inability to carry out
4 normal day-to-day work, family and recreational activities that she enjoyed prior to
5 the accident in question.

6 5.3 As a further direct and proximate result of the Defendants'
7 negligence, Plaintiffs have expended and will be compelled to expend significant
8 amounts of money for medical, hospital and related medical services in an effort to
9 regain Plaintiff Sherry Hanson's health and her normal physical condition that
10 existed prior to the accident in question, the exact extent of which is currently
11 unknown, but will be further established and proven at the time of trial.

12 5.4 As a further direct and proximate result of the negligence of the
13 defendants, Plaintiff Sherry Hanson has become permanently physically disabled.

14 5.5 As a further direct and proximate result of the negligence of
15 Defendants, Plaintiffs have suffered other pecuniary losses in amounts currently
16 unknown, but to be proven and established at the time of trial.

17 5.6 As a further direct and proximate result of the negligence of
18 Defendants, Plaintiff Steven Hanson has suffered loss of consortium in an amount
19 currently unknown, but to be proven and established at the time of trial.

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COMPLAINT FOR
PERSONAL INJURIES - 4

WALLSTROM LAW OFFICES
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1 ***EXHAUSTION OF ADMINISTRATIVE PROCEDURES***

2 6.

3 6.1 Pursuant to 28 U.S.C. §2675, Plaintiffs filed a Claim for Damages
4 with the United States Postal Service on March 30, 2011 and with the United
5 States General Services Administration on March 29, 2011. Those Claims for
6 Damages complied with statutory requirements. More than six months have
7 expired since those claims were filed. Neither agency has responded to accept or
8 deny the claim.

9
10 6.2 In accordance with the law of the State of Washington, on April
11 12, 2011, Plaintiffs served a Claim for Personal Injuries setting forth Plaintiffs'
12 claims herein on Defendant City of Seattle. That Claim for Personal Injuries
13 complied with statutory requirements. More than sixty (60) days have expired
14 since service of that Claim for Personal Injuries on the City of Seattle.

15
16 ***PRAYER FOR RELIEF***

17 7.

18
19 WHEREFORE, Plaintiffs, pray that judgment be entered against
20 Defendants jointly and severally, for the following damages in amounts to be
21 established at the time of trial:

- 22 7.1 Pain, suffering and mental anguish (past, present and future);
23 7.2 Permanent physical disability;

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25 COMPLAINT FOR
26 PERSONAL INJURIES - 5

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1 7.3 Past and future medical expenses;

2 7.4 Past and future income loss;

3 7.5 The resulting decrease in Plaintiff Sherry Hanson's quality of life

4 which has resulted from the physical restrictions and impairment which have

5 adversely affected plaintiff's social, family, recreational and career objectives;

6 7.6 Loss of consortium;

7 7.7 Plaintiff's allowable attorney's fees and costs of suit; and

8 7.8 For such other and further relief as the court deems just and

9 equitable.

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11 Dated this 27th day of October 2011.

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s/Paul Wallstrom
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COMPLAINT FOR
PERSONAL INJURIES - 6

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